

PI-82-0110

November 18, 1982

Mr. B.H. Blackmon
President, Cook Inlet Pipe Line Company
P.O. Box 900
Dallas, TX 75221

Dear Mr. Blackmon:

Your letter dated October 25, 1982, concerned the maximum operating pressure for a segment of the Cook Inlet pipeline system and asked whether a reduction in operating pressure is an acceptable remedy for corrosion pitting. You referred to an interpretation of §§195.416(f) and (g) given to Williams Pipe Line Company on August 16, 1982, and asked whether your understanding of that interpretation is correct.

The referenced interpretation says in rather lead-footed terms that a reduction in operating pressure, commensurate with the remaining pipe thickness, is an acceptable remedy for general corrosion under §195.416(f) as well as isolated corrosion pitting under §195.416(g).

Your understanding of that interpretation is correct as given in your letter. Please be advised, however, that maximum operating pressure is limited by all of the requirements of §195.406.

Sincerely,

Original signed by Richard L. Beam
Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

October 25, 1982

COOK INLET PIPE LINE COMPANY
P. O. BOX 900
DALLAS, TEXAS 75221

Mr. Richard L. Beam
Associate Director for Pipeline Safety Regulation
Materials Transportation Bureau
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Mr. Beam:

We would like to establish an understanding relative to the repair of the Cook Inlet pipeline system, which was discussed by our representative, Mr. Dale Wilson, at the API-DOT meeting on September 8.

A 20-mile segment of the Cook Inlet pipeline system was surveyed for corrosion pitting this summer and no corrosion indications more severe than "moderate" (30% to 50% wall loss) were disclosed. The maximum operating pressure of this system based on 20" O.D., .250" WT, Grade X52 has been established at 936 psi. It is our understanding that the DOT's August 16, 1982 Pipeline Safety Regulatory Interpretation granted to Williams Brothers will allow us to reestablish the maximum operating pressure at 468 psi for this pipeline segment. This is based on using the remaining wall thickness at the bottom of a moderate pit of maximum depth in the pressure formula of Section 195.106 (liquid regulations).

Please let us know if our understanding is correct.

Yours very truly,
B. H. Blackmon
President